

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
EUDIS MANUEL SOSA	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
EUDIS MANUEL SOSA	:	CASE NO. 5-24-bk-01476
Respondent	:	

TRUSTEE’S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 10<sup>th</sup> day of February 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)’ Plan for the following reason(s):

1. The Debtor has not provided the Trustee with information needed in order for the Trustee to comply with § 1302(b)(6).
6. Trustee avers that Debtor(s)’ Plan cannot be administered due to the lack of the following:
  - a. Debtor(s) has not provided to Trustee the Proof of Claim(s) for Luzerne County Tax Claim Bureau.

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 19th day of November 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

TULLIO DeLUCA, ESQUIRE  
381 N 9TH AVENUE  
SCRANTON, PA 18504-

/s/Tammy Life  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee